

## Instructions for Using the Plan Review Crosswalk for Review of Local Mitigation Plans

Attached is a Plan Review Crosswalk based on the *Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000*, published by FEMA, dated March 2004. This Plan Review Crosswalk is consistent with the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Part 201 – Mitigation Planning, Interim Final Rule* (the Rule), published February 26, 2002.

**SCORING SYSTEM**

**N – Needs Improvement:** The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

**S – Satisfactory:** The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory." A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing.

When reviewing single jurisdiction plans, reviewers may want to put an N/A in the boxes for multi-jurisdictional plan requirements. When reviewing multi-jurisdictional plans, reviewers may want to put an N/A in the prerequisite box for single jurisdiction plans.

States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

Optional matrices for assisting in the review of sections on profiling hazards, assessing vulnerability, and identifying and analyzing mitigation actions are found at the end of the Plan Review Crosswalk.

The example below illustrates how to fill in the Plan Review Crosswalk.

**Example**

Assessing Vulnerability: Overview

**Requirement §201.6(c)(2)(ii):** [The risk assessment *shall* include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description *shall* include an overall summary of each hazard and its impact on the community.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan include an <b>overall summary</b> description of the jurisdiction's <b>vulnerability</b> to each hazard?	Section II, pp. 4-10	The plan describes the types of assets that are located within geographically defined hazard areas as well as those that would be affected by winter storms.		✓
B. Does the plan address the <b>impact</b> of each hazard on the jurisdiction?	Section II, pp. 10-20	The plan does not address the impact of two of the five hazards addressed in the plan. <b>Required Revisions:</b> • Include a description of the impact of floods and earthquakes on the assets. <b>Recommended Revisions:</b> • This information can be presented in terms of dollar value or percentages of damage.	✓	
SUMMARY SCORE			✓	

Jurisdiction: **CARBON COUNTY, MONTANA**

## Local Mitigation Plan Review and Approval Status

<b>Jurisdiction:</b> <b>Carbon County</b>	<b>Title of Plan:</b> Carbon County Pre-Disaster Mitigation and Community Wildfire Protection Plan	<b>Date of Plan:</b> August 2005
<b>Local Point of Contact:</b> Darrel Krum	<b>Address:</b> Carbon County DES PO Box 887 Red Lodge, MT 59068	
<b>Title:</b> Carbon County DES Coordinator		
<b>Agency:</b> Carbon County DES		
<b>Phone Number:</b> 406-446-1038	<b>E-Mail:</b> d.krum@co.carbon.mt.us	

<b>State Reviewer:</b> Kent Atwood	<b>Title:</b> SHMO	<b>Date:</b> January 13, 2006
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<b>FEMA Reviewer:</b> Ken Crawford Jennifer Fee Wade Nofziger	<b>Title:</b> Mitigation Specialist Planner Mitigation Specialist	<b>Date:</b> January 25, 2006  February 10, 2006
<b>Date Received in FEMA Region VIII</b>	January 17, 2006	
<b>Plan Not Approved</b>		
<b>Plan Approved</b>	XXX	
<b>Date Approved</b>	March 17, 2006	

<b>Jurisdiction:</b>	<b>NFIP Status*</b>			
	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>CRS Class</b>
1. Carbon County	X			
2. Town of Bearcreek			X	
3. Town of Bridger			X	
4. Town of Fromberg	X			
5. Town of Joliet	X			

# LOCAL HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VIII

Jurisdiction: **CARBON COUNTY, MONTANA**

5. City of Red Lodge	X			
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\* **Notes:**                      **Y = Participating**                      **N = Not Participating**                      **N/A = Not Mapped**

## MITIGATION PLAN REVIEW SUMMARY

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "**Needs Improvement**" score.

### SCORING SYSTEM

Please check one of the following for each requirement.

**N – Needs Improvement:** The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

**S – Satisfactory:** The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Prerequisite(s) (Check Applicable Box)	NOT MET	MET
Adoption by the Local Governing Body: §201.6(c)(5) <b>OR</b>		N/A
Multi-Jurisdictional Plan Adoption: §201.6(c)(5) <b>AND</b>		X
Multi-Jurisdictional Planning Participation: §201.6(a)(3)		X
Planning Process	N	S
Documentation of the Planning Process: §201.6(b) and §201.6(c)(1)		X
Risk Assessment	N	S
Identifying Hazards: §201.6(c)(2)(i)		X
Profiling Hazards: §201.6(c)(2)(i)		X
Assessing Vulnerability: Overview: §201.6(c)(2)(ii)		X
Assessing Vulnerability: Identifying Structures: §201.6(c)(2)(ii)(A)	X	
Assessing Vulnerability: Estimating Potential Losses: §201.6(c)(2)(ii)(B)	X	
Assessing Vulnerability: Analyzing Development Trends: §201.6(c)(2)(ii)(C)	X	
Multi-Jurisdictional Risk Assessment: §201.6(c)(2)(iii)		X

**Mitigation Strategy**

Local Hazard Mitigation Goals: §201.6(c)(3)(i)  
 Identification and Analysis of Mitigation Actions:  
 §201.6(c)(3)(ii)  
 Implementation of Mitigation Actions:  
 §201.6(c)(3)(iii)  
 Multi-Jurisdictional Mitigation Actions:  
 §201.6(c)(3)(iv)

N	S
	X
	X
	X
	X

**Plan Maintenance Process**

Monitoring, Evaluating, and Updating the Plan:  
 §201.6(c)(4)(i)  
 Incorporation into Existing Planning Mechanisms:  
 §201.6(c)(4)(ii)  
 Continued Public Involvement: §201.6(c)(4)(iii)

N	S
	X
	X
	X

**Additional State Requirements\***

Insert State Requirement  
 Insert State Requirement  
 Insert State Requirement

N	S

**LOCAL MITIGATION PLAN APPROVAL STATUS**

PLAN NOT APPROVED

☐

PLAN APPROVED

☒

\*States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

**See Reviewer's Comments**

This is an excellent plan that should be easy to revise and update as you go through your annual reviews. Good information and research was accomplished. The process was completed according to guidelines and well done. "Should" categories are left as "needing improvement" because they can be expanded to be more complete.

## PREREQUISITE(S)

## Adoption by the Local Governing Body

**Requirement §201.6(c)(5):** [The local hazard mitigation plan **shall** include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council).

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Has the local governing body adopted the plan?		N/A		
B. Is supporting documentation, such as a resolution, included?		N/A		
SUMMARY SCORE				N/A

## Multi-Jurisdictional Plan Adoption

**Requirement §201.6(c)(5):** For multi-jurisdictional plans, each jurisdiction requesting approval of the plan **must** document that it has been formally adopted.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the plan indicate the specific jurisdictions represented in the plan?	Page v	All of the incorporated jurisdictions are represented in the plan. These jurisdictions have also adopted the Community Wildfire Protection Plan (CWPP).		X
B. For each jurisdiction, has the local governing body adopted the plan?	Pages vi-xi	All participating jurisdictions adopted the plan.		X
C. Is supporting documentation, such as a resolution, included for each participating jurisdiction?	Pages vi-xi	Signed resolutions for all are provided in the plan.		X
SUMMARY SCORE				X

## Multi-Jurisdictional Planning Participation

**Requirement §201.6(a)(3):** Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does the plan describe <b>how</b> each jurisdiction participated in the plan's development?	Pages II-2-II-36	Three Steering Committee meetings were held throughout the development of the plan. Table 2.1 lists the Committee members. Steering committee/public meeting summaries, briefings, and meeting announcements are provided in the plan. The plan exhibits an excellent planning process.		X

SUMMARY SCORE

X

PLANNING PROCESS: §201.6(b): *An open public involvement process is essential to the development of an effective plan.*

### Documentation of the Planning Process

**Requirement §201.6(b):** *In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process **shall** include:*

- (1) *An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;*
- (2) *An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and*
- (3) *Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.*

**Requirement §201.6(c)(1):** *[The plan **shall** document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan provide a narrative description of the process followed to prepare the plan?	Pages II-2-II-36	The planning process was well documented and includes notes, agendas, sign-in sheets and newspaper articles.		X
B. Does the plan indicate who was involved in the planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?)	Pages II-2-II-36	The plan was prepared by County residents, Steering Committee, County Fire Council, participating jurisdictions, LEPC and County contractor Barb Beck. Meeting summaries, briefings, and sign-in sheets are included in the plan		X
C. Does the plan indicate how the public was involved? (Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?)	Pages II-2-II-36	Public input was sought and received in Steering Committee meetings and other public meetings.		X
D. Was there an opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	Pages II-2-II-36	Very inclusive in their approach. Besides the county jurisdictions, they included the US Forest Service, Bureau of Land Management, National Weather Service, MT Department of Transportation, and Beartooth Electric, and others. Good job.		X
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	Page III-1	Predominately, interviews and recollections from the group on past historic events were cited, then cross-referenced with local media reports and noted in the plan. State and federal data bases were searched. "SHELDUS" and other website data was noted in hazards analysis.  <b>Recommendation:</b> In the next revision, we recommend placing more emphasis on actual review and analysis of existing studies, plans and codes		X

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		would benefit the plan to identify potential mitigation projects and isolate areas of risk.		
SUMMARY SCORE				X

**RISK ASSESSMENT:** §201.6(c)(2): *The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.*

### Identifying Hazards

**Requirement §201.6(c)(2)(i):** *[The risk assessment shall include a] description of the type ... of all natural hazards that can affect the jurisdiction.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan include a <b>description</b> of the types of <b>all natural hazards</b> that affect the jurisdiction? If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a Satisfactory score. Consult with the State Hazard Mitigation Officer to identify applicable hazards that may occur in the planning area.	Pages III-1-III-21, V-4-V-18	Each hazard profile provides a description of the hazard potentially impacting the county.  The plan does a great job at including information from local newspapers. The plan includes information for all identified hazards and in most cases the data used is more extensive than that found from readily available on-line resources.  A Flood Insurance Study is available for Carbon County, including incorporated cities of Fromberg, Joliet, and Red Lodge. <a href="http://msc.fema.gov/">http://msc.fema.gov/</a> . There are Q3 data available for Carbon County. Refer to <a href="http://www.hazards.gov">www.hazards.gov</a> .  The plan indicates on page III-3 that there are a total of 12 dams and two are high hazard. The National Inventory of Dams appears to indicate that there are 16 dams in Carbon County and four of them, Glacier Lake North Dam, Glacier Lake South Dam, Depression Detention Dam, and Cooney Dam, are high hazard dams. The National Dam Safety Act requires that an emergency action plan (EAP) be completed for high hazard dams. Two of the four high hazard dams appear not to have an EAP. Developing an EAP for Glacier Lake North Dam and Glacier Lake South Dam would be beneficial mitigation strategy. Please see <a href="http://crunch.tec.army.mil/nid/webpages/nid.cfm">http://crunch.tec.army.mil/nid/webpages/nid.cfm</a> (introduction and download dam data) for National Dam Inventory information.		X

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		Online EPA data suggests that there are no toxic release inventory sites in Carbon County. Please see <a href="http://www.epa.gov/triexplorer/">http://www.epa.gov/triexplorer/</a> for more information.		
SUMMARY SCORE				X

## Profiling Hazards

**Requirement §201.6(c)(2)(i):** *[The risk assessment shall include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the risk assessment identify the <b>location</b> (i.e., geographic area affected) of each natural hazard addressed in the plan?	Pages III-1-III-10, V-8-V-17	The hazard profiles describe the geographical area of all identified hazards, especially wildfire found in section V 8-17.		X
B. Does the risk assessment identify the <b>extent</b> (i.e., magnitude or severity) of each hazard addressed in the plan?	Pages III-1-III-10, V-8-V-17	The magnitude of past events is highlighted in the hazard profiles and structure loss and associated costs are included when applicable. The plan also includes potential loss estimates for all identified hazards.		X
C. Does the plan provide information on <b>previous occurrences</b> of each hazard addressed in the plan?	Pages III-1-III-10, V-8-V-17	Previous occurrences of each type hazard are addressed in the hazard profiles.		X
D. Does the plan include the <b>probability of future events</b> (i.e., chance of occurrence) for each hazard addressed in the plan?	Pages III-1-III-10, V-8-V-17	Each hazard profile contains a section on vulnerability, which addresses probability of future events. Within the CWPP, the Individual Community Assessment section contains the ignition risk for each community.		X
SUMMARY SCORE				X

## Assessing Vulnerability: Overview

**Requirement §201.6(c)(2)(ii):** *[The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan include an <b>overall summary</b> description of the jurisdiction's <b>vulnerability</b> to each hazard?	Pages III-1-III-10, V-8-V-17	Each hazard profile contains a section on vulnerability, which is related to potential losses and potential population losses.		X
B. Does the plan address the <b>impact</b> of each hazard on the jurisdiction?	Pages III-1-III-10, V-8-V-17	The hazard profiles identify past events related to location, which include the impacts in terms of loss structures, injuries, deaths, and costs. The CWPP includes extensive information on the impacts from wildfire on individual communities,		X



		including: land use, structures, and vulnerable populations.		
			SUMMARY SCORE	X

### Assessing Vulnerability: Identifying Structures

**Requirement §201.6(c)(2)(ii)(A):** *The plan **should** describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area ... .*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan describe vulnerability in terms of the <b>types and numbers</b> of <b>existing</b> buildings, infrastructure, and critical facilities located in the identified hazard areas?	Pages III 21-27 V 22-23, V 35-36	<p><b>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</b></p> <p>The plan does include existing buildings, infrastructure and critical facilities and includes: facility name, address, year built, square footage, and value. The critical facilities are separated by cities within the county, but the plan does not make a connection to identified hazard areas. The plan also includes a map depicting the critical facilities for all participating jurisdictions.</p> <p>The CWPP includes a county map that depicts the wildland urban interface. Table 5.4-5.5 lists the major subdivisions located in the wildland interface, although location and numbers of lots are included, costs are not. Table 5.6 lists assets, numbers, and total costs for potential loss to wild fires.</p> <p><b>Required Revisions for future updates:</b></p> <p>For each hazard, identify the type and number of existing buildings, infrastructure, and critical facilities <b>within each hazard area.</b></p> <p>While not required by the Rule, it is useful to inventory structures located within areas that have repeatedly flooded and collect information on past insurance claims. At a minimum, describe repetitive loss neighborhoods or areas in the plan.</p> <p>For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.</p>	X	
B. Does the plan describe vulnerability in terms of the <b>types and numbers</b> of <b>future</b> buildings, infrastructure, and critical facilities located in the identified hazard areas?	Pages III 21-27 V 22-23, V 35-36	<p><b>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</b></p> <p>The CWPP does a good job at describing types and numbers of future buildings located in fire hazard areas, which are listed by</p>	X	

		<p>specific jurisdictions. Although the wildfire section does a good job at meeting these requirements, none of the other identified hazards describe types and numbers of future buildings, infrastructure, and critical facilities.</p> <p><b>Required Revisions for future updates:</b></p> <p>For <b>each</b> hazard identify the type and number of future buildings, infrastructure, and critical facilities within each hazard area.</p> <p><b>Additional Suggestions:</b></p> <p>Identify the types of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal buildings), infrastructure (e.g., roadways, bridges, utilities, and communications systems), and critical facilities (e.g., shelters, hospitals, police, and fire stations).</p> <p>Information on proposed buildings, infrastructure, and critical facilities, including planned and approved development, may be based on information in the comprehensive or land use plan and zoning maps.</p> <p>Identify buildings, infrastructure, and critical facilities that are vulnerable to more than one hazard.</p> <p>Describe the process or method used for identifying future buildings, infrastructure, and critical facilities.</p> <p>Note any data limitations for determining the type and numbers of future buildings, infrastructure, and critical facilities and include in the mitigation strategy actions for collecting the data to improve future vulnerability assessment efforts.</p> <p>For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.</p>		
		SUMMARY SCORE	X	

## Assessing Vulnerability: Estimating Potential Losses

**Requirement §201.6(c)(2)(ii)(B):** [The plan **should** describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate ... .

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan estimate <b>potential dollar losses</b> to vulnerable structures?	Pages III 21-27, 30-36	<p><b>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</b></p> <p>The plan does include potential dollar losses for critical facilities. The critical facilities are listed under corresponding jurisdiction and by hazard type, but other vulnerable structures are not identified for hazards other than wildfire. The CWPP includes a table, which lists potential dollar losses to all vulnerable structures.</p> <p><b>Additional Suggestions for future updates:</b></p> <ul style="list-style-type: none"> <li>• Include, when resources permit, estimates for structure, contents, and function losses to present a full picture of the total loss for each building, infrastructure, and critical facility.</li> <li>• Include a composite loss map to locate high potential loss areas to help the jurisdiction focus its mitigation priorities.</li> <li>• Note any data limitations for estimating losses and include in the mitigation strategy actions for collecting the data to improve future loss estimate efforts.</li> </ul> <p>For a step-by-step method for estimating losses, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 4.</p>	X	
B. Does the plan describe the <b>methodology</b> used to prepare the estimate?	Pages III 30-35, V-35	<p><b>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.</b></p> <p>The plan includes the methodology used to prepare the estimates. The estimates were prepared by identifying costs associated with past occurrences and by using hypothetical incidents for each identified hazard.</p>		X
SUMMARY SCORE			X	

## Assessing Vulnerability: Analyzing Development Trends

**Requirement §201.6(c)(2)(ii)(C):** [The plan **should** describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan describe land uses and development	Pages I 3, V 8-17,	<b>Note: A "Needs Improvement" score on this requirement will</b>	X	

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trends?	V 28	<p><b>not preclude the plan from passing.</b></p> <p>Land Use and development trends are discussed in general terms at the beginning of the plan. The CWPP goes into further detail of future development including: type and numbers of structures associated with each jurisdiction. The plan needs to include population projections and growth in relation to other identified hazard areas.</p> <p><b>Required Revisions for future updates:</b></p> <p>An extensive description of land uses and development trends for wildfire is found within the plan. The plan would benefit from including these descriptions for all applicable hazards.</p>		
SUMMARY SCORE			X	

## Multi-Jurisdictional Risk Assessment

**Requirement §201.6(c)(2)(iii):** For multi-jurisdictional plans, the risk assessment **must** assess each jurisdiction's risks where they vary from the risks facing the entire planning area.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	Pages iv, III 3-17, V 25-31	<p>The plan does include a summary of where risks vary by jurisdiction in the introduction of the plan. Each hazard profile under vulnerability lists jurisdictions that are most susceptible to the identified hazard. The CWPP includes Ignition profile, which identifies jurisdictions most at risk to fire hazards.</p> <p><b>Recommended Revision for future updates:</b></p> <p>Prepare a summary of the various jurisdictions that describe only the risk that vary.</p>		X
SUMMARY SCORE				X

**MITIGATION STRATEGY: §201.6(c)(3):** The plan shall include a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.

## Local Hazard Mitigation Goals

**Requirement §201.6(c)(3)(i):** [The hazard mitigation strategy **shall** include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.

Location in the	SCORE
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Element	Plan (section or annex and page #)	Reviewer's Comments	N	S
A Does the plan include a description of mitigation <b>goals</b> to reduce or avoid long-term vulnerabilities to the identified hazards? ( <b>GOALS</b> are long-term; represent what the community wants to achieve, such as "eliminate flood damage"; and are based on the risk assessment findings.)	Pages IV 1-7	The plan identifies five "mitigation" goals, plus wildfire.		X
SUMMARY SCORE				X

## Identification and Analysis of Mitigation Actions

**Requirement §201.6(c)(3)(ii):** *[The mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan identify and analyze a <b>comprehensive range</b> of specific mitigation actions and projects for each hazard?	Pages IV 1-7	The plan identifies and analyzes a broad range of mitigation measures. For the purposes of meeting PDM planning requirements, the plan's range of mitigation actions meet that requirement. However, at least two places in this plan reference the county's desire to have projects eligible to receive FEMA mitigation funding, such as the Hazard Mitigation Grant Program (HMGP), Pre-Disaster Mitigation (PDM), and the Flood Mitigation Assistance (FMA). Most of the projects identified in the plan are Preparedness and Response issues and would not be eligible for mitigation funding. We realize that the identified activities are desired by the county and communities, but perhaps should be placed in the county Emergency Operations Plan (EOP). Fundable activities include the identified drainage projects and the wildfire fuels reduction projects. Other objectives, such a floodplain ordinance and building codes enforcement, while not having funds available, are certainly mitigation activities.		X
B Do the identified actions and projects address reducing the effects of hazards on <b>new</b> buildings and infrastructure?	Pages IV 3-4, V 44	The plan includes projects that address reducing effects of hazards on new buildings, which is to host an educational program for local architects, engineers, and contractors on building standards and materials for wind events and to enforce existing building codes in Red Lodge, educate about building in the floodplain. The CWPP also lists projects related to wildfire and new buildings.		X

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		<b>Suggestion:</b> The plan identifies the need to enforce the existing building codes, which is fine. Unless already done, it is suggested that the county and jurisdictions consider implementing the new International Building Code (IBC).		
C. Do the identified actions and projects address reducing the effects of hazards on <b>existing</b> buildings and infrastructure?	Pages IV 3-4, V 43 – 44	The plan includes several projects that would protect existing buildings and infrastructure. These projects include building packages and materials to avoid wind damage, enforce existing building codes. The CWPP also list several mitigation projects for existing structures related to fire hazard.		X
SUMMARY SCORE				X

## Implementation of Mitigation Actions

**Requirement: §201.6(c)(3)(iii):** [The mitigation strategy section **shall** include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization **shall** include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the mitigation strategy include how the actions are <b>prioritized</b> ? (For example, is there a discussion of the process and criteria used?)	Pages IV 7, V 46	Participant prioritization was used in public meetings (good), as well as identifying potential for loss of life, and the probability of future occurrences.		X
B. Does the mitigation strategy address how the actions will be <b>implemented and administered</b> ? (For example, does it identify the responsible department, existing and potential resources, and timeframe?)	Pages IV 8-11 V 49	The plan includes a description of project implementation and discusses who would be responsible and gives timeframes and funding sources for the projects.		X
C. Does the prioritization process include an emphasis on the use of a <b>cost-benefit review</b> (see page 3-36 of <i>Multi-Hazard Mitigation Planning Guidance</i> ) to maximize benefits?	Page IV 12	The plan includes a discussion on putting an emphasis on benefits compared to costs for the projects when they are developed and shows in a matrix the general cost vs benefits, as required.		X
SUMMARY SCORE				X

## Multi-Jurisdictional Mitigation Actions

**Requirement §201.6(c)(3)(iv):** For multi-jurisdictional plans, there **must** be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S

Jurisdiction: **CARBON COUNTY, MONTANA**

A Does the plan include at least one identifiable <b>action item</b> for each jurisdiction requesting FEMA approval of the plan?	Pages IV 8-10 V 46-47	Most broad ranging "objectives" are county-wide, and include all population centers it can be assumed, although it would be helpful to identify by community what projects are helping which participating planning partners.		X
SUMMARY SCORE				X

## PLAN MAINTENANCE PROCESS

## Monitoring, Evaluating, and Updating the Plan

**Requirement §201.6(c)(4)(i):** *[The plan maintenance process shall include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan describe the method and schedule for <b>monitoring</b> the plan? (For example, does it identify the party responsible for monitoring and include a schedule for reports, site visits, phone calls, and meetings?)	Page VI 1	The Carbon County Commissioners will be responsible for monitoring the plan. The co-leads for monitoring the plan are Carbon County Disaster and Emergency Services Coordinator and the Chair of LEPC. A schedule includes three situations that would trigger the review of the plan.		X
B. Does the plan describe the method and schedule for <b>evaluating</b> the plan? (For example, does it identify the party responsible for evaluating the plan and include the criteria used to evaluate the plan?)	Page VI 1	Four criteria are identified for evaluating the plan.		X
C. Does the plan describe the method and schedule for <b>updating</b> the plan within the five-year cycle?	Page VI 1	The plan identifies three triggers that would trigger an update of the plan.		X
SUMMARY SCORE				X

## Incorporation into Existing Planning Mechanisms

**Requirement §201.6(c)(4)(ii):** *[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?	Page VI 2	The plan includes other plans that the mitigation plan could be incorporated into. The two plans identified are Growth Policy and subdivision regulations and the Emergency Operations Plan.		X
B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?	Page VI 2	The Mitigation Plan will be recommended for incorporation into the Growth Policy and subdivision regulations and the		X

Jurisdiction: **CARBON COUNTY, MONTANA**

		Emergency Operations Plan when revisions of these two plans are scheduled.		
SUMMARY SCORE				X

## Continued Public Involvement

**Requirement §201.6(c)(4)(iii):** *[The plan maintenance process **shall** include a] discussion on how the community will continue public participation in the plan maintenance process.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the plan explain how <b>continued public participation</b> will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?)	Page VI 1-2	Steering Committee meetings will be posted in the Carbon County News and the public will be encouraged to participate.		X
SUMMARY SCORE				X

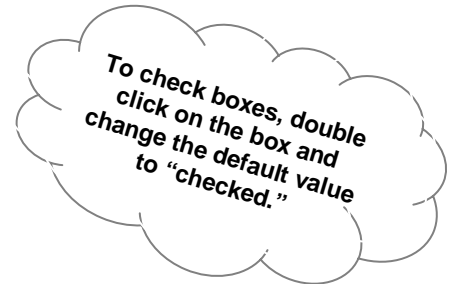


**Matrix A: Profiling Hazards**

This matrix can assist FEMA and the State in scoring each hazard. Local jurisdictions may find the matrix useful to ensure that their plan addresses each natural hazard that can affect the jurisdiction. **Completing the matrix is not required.**

*Note: First, check which hazards are identified in requirement §201.6(c)(2)(i). Then, place a checkmark in either the N or S box for each **applicable** hazard. An “N” for any element of any identified hazard will result in a “Needs Improvement” score for this requirement. List the hazard and its related shortcoming in the comments section of the Plan Review Crosswalk.*

Hazard Type	Hazards Identified Per Requirement §201.6(c)(2)(i)	A. Location		B. Extent		C. Previous Occurrences		D. Probability of Future Events	
	Yes	N	S	N	S	N	S	N	S
Avalanche	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Erosion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Storm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dam Failure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drought	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Earthquake	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expansive Soils	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Extreme Heat	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Flood	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hailstorm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hurricane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Land Subsidence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landslide	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Severe Winter Storm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tornado	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tsunami	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Volcano	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wildfire	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Windstorm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Legend:**

§201.6(c)(2)(i) Profiling Hazards

- A. Does the risk assessment identify the location (i.e., geographic area affected) of each hazard addressed in the plan?
- B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the plan?
- C. Does the plan provide information on previous occurrences of each natural hazard addressed in the plan?
- D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the plan?

**Matrix B: Assessing Vulnerability**

This matrix can assist FEMA and the State in scoring each hazard. Local jurisdictions may find the matrix useful to ensure that their plan addresses each requirement. **Completing the matrix is not required.**

*Note: First, check which hazards are identified in requirement §201.6(c)(2)(i). Then, place a checkmark in either the N or S box for each **applicable** hazard. An “N” for any element of any identified hazard will result in a “Needs Improvement” score for this requirement. List the hazard and its related shortcoming in the comments section of the Plan Review Crosswalk.*

*Note: Receiving an N in the shaded columns will not preclude the plan from passing.*

To check boxes, double click on the box and change the default value to “checked.”

Hazard Type	Hazards Identified Per Requirement §201.6(c)(2)(i)	A. Overall Summary Description of Vulnerability	B. Hazard Impact	A. Types and Number of Existing Structures in Hazard Area (Estimate)	B. Types and Number of Future Structures in Hazard Area (Estimate)	A. Loss Estimate	B. Methodology
	Yes						
Avalanche	<input type="checkbox"/>	§201.6(c)(2)(ii) Assessing Vulnerability: Overview	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Erosion	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Storm	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dam Failure	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drought	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Earthquake	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expansive Soils	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Extreme Heat	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Flood	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hailstorm	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hurricane	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Land Subsidence	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landslide	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Severe Winter Storm	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tornado	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tsunami	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Volcano	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wildfire	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Windstorm	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other _____	<input type="checkbox"/>		§201.6(c)(2)(ii) Assessing Vulnerability: Identifying Structures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other _____	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other _____	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Legend:**

§201.6(c)(2)(ii) Assessing Vulnerability: Overview

- A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?
- B. Does the plan address the impact of each hazard on the jurisdiction?

§201.6(c)(2)(ii)(A) Assessing Vulnerability: Identifying Structures

- A. Does the plan describe vulnerability in terms of the types and numbers of existing buildings, infrastructure, and critical facilities located in the identified hazard areas?

- B. Does the plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas?

§201.6(c)(2)(ii)(B) Assessing Vulnerability: Estimating Potential Losses

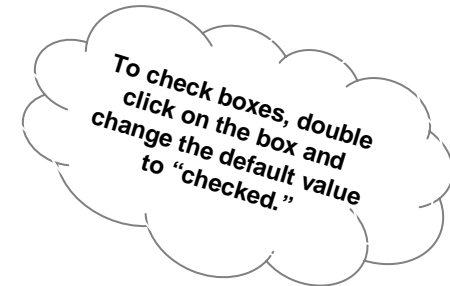
- A. Does the plan estimate potential dollar losses to vulnerable structures?
- B. Does the plan describe the methodology used to prepare the estimate?

**Matrix C: Identification and Analysis of Mitigation Actions**

This matrix can assist FEMA and the State in scoring each hazard. Local jurisdictions may find the matrix useful to ensure consideration of a range of actions for each hazard. **Completing the matrix is not required.**

*Note: First, check which hazards are identified in requirement §201.6(c)(2)(i). Then, place a checkmark in either the N or S box for each **applicable** hazard. An "N" for any identified hazard will result in a "Needs Improvement" score for this requirement. List the hazard and its related shortcoming in the comments section of the Plan Review Crosswalk.*

Hazard Type	Hazards Identified Per Requirement §201.6(c)(2)(i)	A. Comprehensive Range of Actions and Projects	
		Yes	N S
Avalanche	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Erosion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coastal Storm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dam Failure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drought	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Earthquake	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expansive Soils	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Extreme Heat	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Flood	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hailstorm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hurricane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Land Subsidence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landslide	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Severe Winter Storm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tornado	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tsunami	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Volcano	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wildfire	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Windstorm	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Legend:**

§201.6(c)(3)(ii) Identification and Analysis of Mitigation Actions

A. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?